

REMARKS

In the Office Action dated June 28, 2005, claims 1-3 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,396,833 (Zhang); and claims 14, 18, and 21-23 were rejected under § 103 over Zhang in view of U.S. Patent No. 6,744,767 (Chiu).

Applicant acknowledges the allowance of claim 25. Applicant notes that the Office Action has inadvertently indicated independent claims 4, 5, and 7 as being objected to. These claims were previously amended into independent form and thus are allowable.

Applicant also acknowledges the indication that claims 16, 17, 19, and 24 would be allowable if rewritten in independent form. Claims 16, 17, and 19 have been amended from dependent form to independent form, with the scope of each claim remaining *unchanged*, to place these claims in condition for allowance. Claims 14 and 18 have been cancelled, without prejudice, to render the rejection of the claims moot.

It is respectfully submitted that independent claim 1 is not anticipated by Zhang. Note that claim 1 recites a method that includes receiving, in a system, a data unit containing a *source address* indicating a source of a data unit; matching the *source address* with information stored in the system; and enabling entry of the data unit to the first network for communication to a destination device on the first network if the *source address* matches the information stored in the system and denying entry of the data unit to the first network if the *source address* does not match the information stored in the system.

The Office Action cited gateways 82 and 102, Fig. 3, and column 2, line 49-column 3, line 8, of Zhang as disclosing the subject matter of claim 1. Applicant respectfully disagrees. In Zhang, the gateway, upon receiving a packet, extracts a source address from the packet to find a per-user routing table corresponding to the source address. Using this per-user routing table identified based on the source address, the gateway then extracts a *destination address* from the packet to find an entry in the routing table that matches the *destination address*. Routing of the packet is based on matching the *destination address* with an entry in the routing table. See Zhang, 2:49-3:8; 4:19-67. The routing of the packet to one network or another network is thus based on the *destination address* extracted from the packet being matched to an entry of a routing table. Zhang does not teach enabling entry of a data unit to a first network if the *source address* (contained in a received data unit) matches the information stored in the system and

denying entry of the data unit to the first network if the *source* address does not match the information stored in the system, as recited in claim 1.

Therefore, claim 1 is allowable over Zhang.

Similarly, with respect to independent claim 21, Zhang does not disclose a controller to compare a *source address* of an incoming data unit with the address information stored in the system, and to deny further entry of the incoming data unit if the *source address* does not match the address information stored in the system. As discussed above, routing of the packet in Zhang is based on the *destination* address, not on the *source* address. Claim 21 was rejected as being obvious over Zhang and Chiu. In view of the mis-application of Zhang as disclosing the last element of claim 21, it is respectfully submitted that the obviousness rejection is defective since the hypothetical combination of Zhang and Chiu does not teach or suggest all elements of claim 21. See M.P.E.P. § 2143 (8th ed., Rev. 20), at 2100-129. Chiu also does not disclose the element of claim 21 that is missing from Zhang.

Therefore, a *prima facie* case of obviousness of claim 21 over Zhang and Chiu has not been established.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (NRT.0100US).

Respectfully submitted,

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